APR 15 1975
MICHAEL RODAK, JR., CLERK

No. 73-1888

IN THE

Supreme Court of the United States

OCTOBER TERM, 1974

UNITED STATES OF AMERICA,
Petitioner,

v.

STATE OF ALASKA,
Respondent.

On Writ of Certiorari To The United States Court Of Appeals For The Ninth Circuit

SUPPLEMENTAL BRIEF OF THE STATE OF ALASKA, RESPONDENT

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SUPPLEMENTAL BRIEF OF THE STATE OF ALASKA, RESPONDENT

Introductory. The Government's Reply Brief presents a paradox in that it both obscures and illuminates the basic issue. It is therefore deserving of this short, supplemental rejoinder by the State of Alaska.

The Obscurity. In Petitioner's original Brief, we find the unqualified and unequivocal statement: "We accept the findings of fact of the district court." (Pet. Br. p. 35 n. 35). Nowhere did the Government complain that the Findings were too broad or that they were really not Findings of Fact but conclusions. Now it would appear the Government retreats from its original admission, and, without specifying just which Findings it rejects, it claims that some of the Findings include "ultimate legal conclusions" with which it does disagree.

Conceding *arguendo* that some of the District Court's Findings are broadly stated and therefore may contain mixtures of fact and law, Alaska, as well as the Court, are left to wonder just which Findings of Fact the Government accepts and which it rejects. It is also to be noted, in passing, that the Government in seeking a writ of certiorari did not complain that the trial court had improperly stated legal conclusions under the guise of Findings of Fact.

The Government's present approach, we suggest, will set this Court upon a procedure of groping its way through a massive factual record in an attempt to sort out the nuances, details and complexities of factual matters explored by the District Court throughout the course of a lengthy trial — a procedure which is foreign to established appellate review. This serves to re-emphasize the wisdom of leaving to the Fact Finder the primary responsibility for determining the facts. In the final analysis, to do otherwise leaves this Court in a quandary as may be demonstrated below by reference to particular Findings.

Geographic Features of Cook Inlet. The Government makes much of the fact that Alaska omitted mentioning that Cook Inlet was a large body of inland water. If this omission is significant, we suggest it is even more noteworthy that the Government has been unable to find any authority for the proposition that the size of Cook Inlet defeats the emergence of historic title. Alaska recognizes that the uniqueness of Cook Inlet, including its size, does not give rise, standing alone, to historic title. But neither are the geographic features irrelevant. In this connection, the District Court made the following Findings of Fact.

"4. The geographic and economic characteristics of Cook Inlet are such that it would have been unnatural had not the inhabitants of its shores exercised continuous sovereignty over its shores and waters from the earliest times forward, with the acquiescence of foreign nations." (Pet. App. C, p. 22a)

"12. From the beginning of recorded history Cook Inlet has been vital to the economic interest of those persons inhabiting its shore; first the carrying on of the fur trade; from the late 1800's to the present, extensive fishing; and more recently, activity relating to both hard minerals and oil. (See Dr. George Rogers' testimony, Tr. pp. 596-636, and Robert DeArmond's testimony, Tr. pp. 520-570; Dr. William Hunt's testimony, Tr. pp. 474-518; Exhibits GI-HH, IY, IZ, JA, IW)

"13. All of Cook Inlet's waters have been and are such that they have been easily patrolled and protected by the government entity which has controlled its shores. (See Findings 19 through 85 below)

"14. If the United States and the State of Alaska had not controlled the fishing carried on within the disputed area of Cook Inlet, as hereinafter found, there would have been a disastrous effect upon the fish resources in Cook Inlet which had theretofore been exploited by the citizens of the United States and residents of Alaska. The landing law could not and would not have prevented the disaster. (Don Stewart's testimony, Tr. pp. 577-588)

"15. Conversely, the existence and enforcement of such fishing laws were not intended for the benefit of persons living elsewhere, as in Canada, Russia, or Japan. (Rogers' testimony, Tr. pp. 596-636; Stewart's testimony, Tr. pp.

571-596; Ex. AF-1906 Alien Fishing Act; White Act 43 Stat. 464)" (Pet. App. C, p. 24a)

In the Fact-Finding role that presumably the Government would now thrust upon this Court, how would the Government have the Court deal with these Findings. Are the Findings covered by the original statement: "We accept the findings of fact of the district court"? Or by the Government's present position: "We reject those findings which contain ultimate legal conclusions"? And how is this Court to resolve the matter?

Alleged Foreign Findings. To the Government's assertion that foreign vessels were permitted to transit and fish in Lower Cook Inlet, and to the references contained in footnote 8, p. 7, Government's Reply Brief, we would refer this Court to Alaska's Supplemental Brief before the Court of Appeals, pp. 2-5 and its appendix. There we show that foreign vessels were permitted in Cook Inlet only by license or on humanitarian grounds based on safety. As for the so-called Bransen sighting, the evidence is questionable. It is not noted in Exhibits 78 and 80 and could even have been within the admitted territorial sea of Cook Inlet. (Costello Deposition p. 30, A. 263) In weighing this evidence, the Court found against the United States. (Finding 101 Pet. App. C, p. 44a)

Explicit Claim of Jurisdiction Over Cook Inlet. If, as we suggest, the Government has now obscured the basic issue, it has also illuminated it. Alaska has never contended that the United States has made a declaration with the exact words: "We claim Cook Inlet as historic inland waters." The Government's argument, as now set forth in its Reply Brief, is that since the United States has never made such a precise claim, Cook Inlet therefore has not been claimed as a historic inland bay.

Here then we draw for the Court the basic issue that lies at the heart of this case. Alaska contends, *legally*, that the claiming nation need not use the precise words "inland waters" to establish historic title, and *factually* that the United States has nevertheless made explicit claims to Cook Inlet as a historic inland bay.

The Government's Reply Brief again demonstrates its unwillingness or its inability to come to grips with Alaska's basic position. To state or to contend legally that a claiming nation must use the words "we claim X Bay as historic inland waters" is to reveal its absurdity. There has never been such a narrow, strict, unreasonable requirement advanced by any recognized authority. None has been cited and, so far as Alaska is concerned, no such authority can be cited.

So far as the facts are concerned, they are undisputed. With the precedent of the Federal judiciary (the Kodiak Decision), the Executive Branch of the Government, first the Secretary of Commerce and subsequently the Secretary of the Interior, pursuant to Congressional mandate contained in the White Act, promulgated, distributed worldwide, and enforced continuously regulations from 1924 through at least 1957 — a period of 33 years — that defined Cook Inlet as including all adjoining waters north of Cape Douglas and west of Point Gore including the Barren Islands. This was done by these Executives in carrying out the duty imposed upon them in the White Act "to set apart and reserve fishing areas in any of the (Alaskan) waters over which the United States has jurisdiction." Some twelve areas of fisheries districts were defined. Eleven of these districts included the words "territorial coastal waters" of Alaska. (See Exhibit DX IU, 2 App. p. 1171)

Taking note of these particular words, Secretary Udall, in April 1962, stated:

> The reference to waters of the mainland shore and to territorial coastal waters surrounding Kodiak and adjacent islands evidenced the Department's intention to limit its regulatory activities under the White Act to those waters within the three-mile limit recognized as established American law. This language negates any assertion of jurisdiction over the entire waters of the Straits. (PX 98, 2 App. 831)

The point is obvious and it has never been contested by the Federal Government. If the *presence* of the words "territorial coastal waters" in the definition of eleven Alaskan areas limited an assertion of jurisdiction to the traditional three miles from the coast, the *absence* of such words in the description of the twelfth area, Cook Inlet, is as clear an assertion of jurisdiction over all of the waters of Cook Inlet as could possibly be asserted. And this definition, distributed throughout the world, was carried forward year, after year, after year.

A close analogy is found in the adjudication of Chesapeake Bay as a historic bay of the United States. There in a damage suit, in the absence of what the Government would now characterize as an "explicit claim," the Court relied upon a Congressional act defining a revenue district "xx over all the waters, shores, bays, harbors, and inlets comprehended within a line drawn from Cape Henry to

the mouth of the James River." (Stetson v. U.S., EXO (T. 43a)) If by such reasoning, Chesapeake Bay has become a historic inland bay, so by the same reasoning has Cook Inlet.

Respectfully submitted,

CHARLES K. CRANSTON
Attorney for Respondent

THOMAS M. PHILLIPS
Attorney for Respondent

AVRUM GROSS
Attorney General of Alaska

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing SUPPLEMENTAL BRIEF OF THE STATE OF ALASKA, RESPONDENT, has been served upon counsel for Petitioner, Robert H. Bork, Solicitor General; Wallace H. Johnson, Assistant Attorney General; A. Raymond Randolph, Jr., Deputy Solicitor General; Gerald P. Norton, Assistant to the Solicitor General, Office of the Solicitor General, Department of Justice, Washington, D.C. 20530, and upon Mr. Bruce C. Rashkow, Attorney, Department of Justice, and Edward F. Bradley, Attorney, Department of Justice, Washington, D.C. 20530 this 15th day of April, 1975, by hand delivery of the same.

THOMAS M. PHILLIPS
Attorney for Respondent
State of Alaska

8553

UNITED STATES
ALASKA – SOUTH COAST

COOK INLET
NORTHERN PART

Mercator Projection
Scale 1:190,104 at Lat. 61°30'

SOUNDINGS IN FATHOMS
AT MEAN LOWER LOW WATER

DRIFT RIVER
Scale 1:40,000 at Lat. 60°30'
SOUNDINGS IN FATHOMS
(FATHOMS AND FEET TO ELEVEN FATHOMS)
AT MEAN LOWER LOW WATER

NIKISKI
Scale 1:5,000 at Lat. 60°41'
SOUNDINGS IN FATHOMS
AT MEAN LOWER LOW WATER

NIKISKI AND VICINITY
Scale 1:20,000
SOUNDINGS IN FATHOMS
AT MEAN LOWER LOW WATER

Beluga Lake
Mt. Spurr
BELUGA RIVER
SUSITNA RIVER
LITTLE SUSITNA RIVER
KNIK ARM
ANCHORAGE
Pt. Campbell
Fire I.
TURNAGAIN ARM
CHICKALOON BAY
Middle Ground Shoal
Moquawkie Indian Reservation
North Foreland
Cook Inlet
Nikiski
Kenai
KENAI RIVER
SKILAK LAKE
Funny River
Killey River
TUSTUMENA LAKE
Beaver Creek
Kasilof Village
Kasilof River
Harriet Pt.
Redoubt Pt.
Tuxedni Bay
Chisik I.
Drift River
Trading Bay
Kalgin I.
Ladd Landing
Polly Creek
Polly
Chuitna River
Beluga River
Susitna River
Little Susitna River
Knik River
Eagle River
Eklutna
Palmer
Wasilla
Big Lake
Willow
Talkeetna
Anchorage
Kenai River
Skilak Lake
Funny River
Killey River
Tustumena Lake
Beaver Creek
Kasilof River
Cook Inlet
Turnagain Arm
Knik Arm
Chickaloon Bay

CAUTION
THIS DOCUMENT IS NOT FOR USE IN NAVIGATION

The lines drawn on this document delimit provisionally the territorial sea, contiguous zone, and certain internal waters of the United States. They have been prepared by an interdepartmental committee and represent its interpretation of relevant legal principles as applied to the geographical information shown on a Coast and Geodetic Survey nautical chart which has been used as a base. These lines are subject to revision whenever it is required by amplification or correction of the information shown on the chart or by reinterpretation of the legal principles involved. This document does not attempt to delineate international boundaries and is not to be understood as asserting or implying where they are located.

8553 PRICE $1.50

CAUTION
This chart has been corrected only to the print date shown in the lower left corner. Corrections subsequent to this date should be made from the weekly Notice to Mariners.

Published at Washington, D.C.
U.S. DEPARTMENT OF COMMERCE
ENVIRONMENTAL SCIENCE SERVICES ADMINISTRATION
COAST AND GEODETIC SURVEY

(Cook Inlet, Northern Part) C. & G. S. 8553

8554

UNITED STATES
ALASKA - SOUTH COAST

COOK INLET

SOUTHERN PART

Mercator Projection
Scale 1:200,000 at Lat. 60°00'

SOUNDINGS IN FATHOMS
AT MEAN LOWER LOW WATER

CAUTION

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The lines drawn on this document delimit provisionally the territorial sea, contiguous zone, and certain internal waters of the United States. They have been prepared by an interdepartmental committee and represent its interpretation of relevant legal principles as applied to the geographical information shown on a Coast and Geodetic Survey nautical chart which has been used as a base. These lines are subject to revision whenever it is required by amplification or correction of the information shown on the chart or by reinterpretation of the legal principles involved. This document does not attempt to delineate international boundaries and is not to be understood as asserting or implying where they are located.

COOK INLET

NIKOLCHIK HARBOR
Scale 1:5,000 at Lat. 60°02'
SOUNDINGS IN FEET
AT MEAN LOWER LOW WATER

ILIAMNA L.

AUGUSTINE ISLAND

KAMISHAK BAY

CAPE DOUGLAS

KENNEDY ENTRANCE

PENINSULA

8554 PRICE $1.50

CAUTION
This chart has been corrected only to the print date shown in the lower left-hand corner. Corrections subsequent to this date should be made from the weekly Notice to Mariners.

Published at Washington, D.C.
U.S. DEPARTMENT OF COMMERCE
ENVIRONMENTAL SCIENCE SERVICES ADMINISTRATION
COAST AND GEODETIC SURVEY

(Cook Inlet - Southern Part)

C. & G. S. 8554
PRICE $1.50

WEEKLY NOTICE TO MARINERS

Legend

Base Map (to 1867)

- RUSSIAN SETTLEMENTS
- SIX-MILE CLOSURE

First Overlay (1867-1900)

- TRADING POSTS
- SETTLEMENTS
- FUR FARMS
- MARITIME BOARDINGS
- OVERLAND ROUTES

Second Overlay (1900-1959)

- CANNERIES
- RAILROAD
- MINING ACTIVITY
- OIL DRILLING ACTIVITY
- TEN-MILE CLOSURE
- TWENTY-FOUR MILE CLOSURE

153°00' 152°00' 151°00' 150°00'

61°00'

60°00'

59°00'

154°00' 153°00' 152°00' 151°00' 150°00'

HISTORIC DEVELOPMENT of the COOK INLET BASIN

Scale 1:350,000 at Lat 60°00'

Hydrography based upon USC & GS Chart 8502

EXHIBIT H-V

Legend

Base Map (to 1867)

- RUSSIAN SETTLEMENTS
- SIX-MILE CLOSURE

First Overlay (1867-1900)

- TRADING POSTS
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61°00'

60°00'

59°00'

154°00' 153°00' 152°00' 151°00' 150°00'

HISTORIC DEVELOPMENT of the COOK INLET BASIN

Scale 1:350,000 at Lat. 60°00'

Hydrography based upon USC & GS Chart 8502

569-731 O - 75 (Inside back cover) No. 3

No. 8502 PRICE 75 CENTS

ALASKA - SOUTH COAST

CAPE ST. ELIAS TO SHUMAGIN ISLANDS

SOUNDINGS IN FATHOMS
AT MEAN LOWER LOW WATER

ABBREVIATIONS

Lights F. fixed; Fl. flashing; Oc. occult.; Int. interrupted quick; Vy. short-long; Alt. revolving; Occ. occulting; Alt. alternating; Gp. group; W. white; R. red; G. green; m. miles; min. minutes; sec. seconds; ec. eclipse; D. destroyed; ht. height; vis. visible; intens. intensity; obscured; 10,000 candlepower; 10,000 communicated light; Lights are white unless otherwise indicated.

Buoys C. can; N. nun; S. spar; R.R. reflector; T.B. temporary buoy; Red beacons; G. white unless otherwise indicated.

R. Bn. radiobeacon.

C.G. Coast Guard Station; R.T. radio tower.

D. clay; Cn. canoe; G. gravel; Grs. grass; M. mud; Rk. rock; S. sand; Sh. shells; bk. black; br. brown; bu. blue; grn. green; gy. gray; r. red; wh. white; y. yellow; and hard; rky. rocky; sft. soft; stk. sticky; tk. coarse; (?) doubtful.

P.D. position doubtful; E.D. existence doubtful; Obstr. obstruction.

HEIGHTS in feet above mean high water.

AUTHORITIES

Hydrography and topography by the Coast and Geodetic Survey with additions and revisions from the Geological Survey and Hydrographic Office.

ALEUTIAN ISLANDS

KAMISHAK BAY

PORTLOCK BANK

BRISTOL BAY

SHUMAGIN ISLANDS

CHUGACH MOUNTAINS

ALASKA PENINSULA

ALASKA GULF OF

Published at Washington, D. C., Aug. 1944 (11th Edition)
(Prior Issue, 1937)
U. S. COAST AND GEODETIC SURVEY
E. F. A. Bowie, Director

LIGHTS, BEACONS, BUOYS, AND DANGERS CORRECTED FOR INFORMATION RECEIVED TO THE FOLLOWING DATE

(Cape St. Elias to Shumagin Islands) USC&GS 8502

PRICE 75 CENTS

No. 8002 PRICE 75 CENTS

ALASKA

DIXON ENTRANCE TO CAPE ST. ELIAS

SOUNDINGS IN FATHOMS
AT MEAN LOWER LOW WATER

(For reference navigation only)

ABBREVIATIONS

Lights: F. fixed; Fl. flashing; Gp. group; I. Oc. (interrupted quick); Iso. (isophase); Occ. (occulting); Alt. (alternating); Mo. (morse); W. white; R. red; G. green; vis. (visible); nom. (nominal); m. (metres); ft. (feet); Horiz. (horizontal); vis. (visibility); STC. (short time characteristic); LFl. (long flash); Lights are white unless otherwise noted.

Beacons: C. (can); S. (spar); PGT. (perch with target); T. (tripod); Con. (conspicuous); Horn: Diaphone; Bell; Whistle; Gong; Explosive; Siren; Reed; Trumpet; Submarine; Radio beacon; Ra. Refl. (radar reflector); Ra. Ref. (radar reflector); Ra. Tr. (radar transponder beacon); Ra. Bn. (radiobeacon).

C.G. Coast Guard Station; R.T. radio tower.

D. (day); N. (night); F. (fixed); Fl. (flash); E. (east); Ec. (eclipse); Dir. (directional); Alt. (alternating); Mo. (morse); W. (white); R. (red); G. (green); Vert. (vertical); Horiz. (horizontal); sec. (second); m. (minute); h. (hour); ft. (feet); m. (metre); M. (nautical mile); F.P. (position doubtful); I.P. (existence doubtful); Obscr. (obscured).

Heights in feet above mean high water.

Elevations in feet above mean high water.

AUTHORITIES

United States and foreign surveys.

RADIONAVIGATION SIGNALS

For schedule of operations see Light List and for changes see Notice to Mariners.

Stations

Langara Lightstation
Triple Island Lightstation (Pine Island Cottage)
Dixon Entrance Lightstation
Cape Muzon Lightstation
Cape Bazan Lightstation
Cape St. Elias Lightstation

Signal

Gp. 2 dots (0.3 second each) 2 seconds for 60 sec., about 1.50 mi.
Gp. 3 dashes (0.9 second each) 3 long dashes for 60 sec., about 1.50 mi.
Gp. 2 dots (0.3 second each) 2 seconds for 60 sec., about 1.50 mi.
Gp. 2 and 3 dashes (0.9 second each) 5 seconds for 60 sec., about 1.50 mi.
Single dashes (0.9 second each) 3 seconds for 60 sec., about 1.50 mi.
Single dashes (0.9 second each) 3 seconds for 60 sec., about 1.50 mi.
Gp. 2 dashes (0.9 second each) 4 seconds for 60 sec., about 1.50 mi.

GULF OF ALASKA

VAR 28°E (1947)
ANNUAL DECREASE 2'

VAR 27°E (1947)
ANNUAL INCREASE 3'

PROPOSED BASE LINE
FROM WHICH TO MEASURE THREE MILE LIMIT
FOR FISHERY REGULATIONS

OVERLAY FOR U.S.C.& G.S. CHART 8002
"Dixon Entrance to Cape St. Elias"

DIXON ENTRANCE

Pratt Seamount

Walker Seamount

Dickins Seamount

Chart 8002

(LONG CHART 7002)

Published at Washington, D.C., June 1966 (9th Edition)
U. S. COAST AND GEODETIC SURVEY
A. O. Gallant, Director

LIGHTS, BEACONS, BUOYS, AND DANGERS CORRECTED FOR INFORMATION RECEIVED TO DATE OF ISSUE

(Dixon Entrance to Cape St. Elias) U.S.C.&G.S. 8002
PRICE 75 CENTS

No 8502 PRICE 75 CENTS

ALASKA - SOUTH COAST

CAPE ST. ELIAS TO SHUMAGIN ISLANDS

SOUNDINGS IN FATHOMS
AT MEAN LOWER LOW WATER

ABBREVIATIONS

Lights. F. fixed, Fl. flashing, Oc. occult, I. Qk. interrupted quick, Vi. short-long, Alt. alternating, Al. alternating, Gp. group, W. white, R. red, G. green, Vis. visible, Intens. intensified, Obsc. obscured, sec. second, m. min., m. minute, hr. hour, mi. mile, int. intensity, ec. eclipse, obscured, intermittent, vis. visible, NW. northwest, NE. northeast, SE. southeast, SW. southwest, NEARD. northeastward light. Lights are white unless otherwise indicated

Beacons. C. con., B. mast, L. spar, REF. reflector, T. temporary, Sig. Sta. signal station, R. Tr. radio tower

R. Bn. radiobeacon

C.G. Coast Guard Station, R. Tr. radio tower

Colors. Bk. black, Br. brown, Bu. blue, Gn. green, Gy. gray, O. orange, R. red, W. white, Y. yellow, bnd. banded, hor. horizontal, v.tr. with vertical triangle, sq. square, Ch. checkered, D. diamond, P.D. positions doubtful, U.K. unknown doubtful. Other abbreviations

HEIGHTS in feet above mean high water

AUTHORITIES

Hydrography and topography by the Coast and Geodetic Survey with additions and revisions from the Geological Survey and Hydrographic Office

PROPOSED BASE LINE
FROM WHICH TO MEASURE THREE MILE LIMIT
FOR FISHERY REGULATIONS

OVERLAY FOR U.S.C.&G.S. CHART 8502
Cape St. Elias to Shumagin Islands

Published at Washington, D.C., Aug. 1944 (11th Edition)
(Previous Edition 1941)
U. S. COAST AND GEODETIC SURVEY
E. F. A. Rhode, Director

LIGHTS, BEACONS, BUOYS, AND DANGERS CORRECTED FOR INFORMATION RECEIVED TO THE FOLLOWING DATE

No. 8802

DX G H 5 - G H 6

ALASKA

ALASKA PENINSULA AND ALEUTIAN ISLANDS TO SEGUAM PASS

SOUNDINGS IN FATHOMS
AT MEAN LOWER LOW WATER

CAUTION

Temporary defects in aids to navigation are not indicated on the charts except where a buoy replaces a fixed aid. See Notice to Mariners.

THE MAGNETIC ATTRACTION

LORAN
GENERAL EXPLANATION

FREQUENCY CHANNEL (pre-existing) (1950 on)

BASIC PULSE RECURRENCE RATE
(1) (2) (3) pulses per second

SPECIFIC RECURRENCE RATES assigned for station identification (following 1)
1
2

EXAMPLE 1L6

RATES ON THIS CHART
1L6 1L7

The numerical exponent with the 1 express correction indicates the recurrence rate to which it applies.

EXAMPLE 2S7

LINEAR INTERPOLATOR

PROPOSED BASE LINE
FROM WHICH TO MEASURE THREE MILE LIMIT
FOR FISHERY REGULATIONS

OVERLAY FOR U.S.C.&G.S. CHART 8802
Alaska Peninsula and Aleutian Islands to Seguam Pass

BERING SEA
ALEUTIAN ISLANDS
PACIFIC OCEAN
BRISTOL BAY
CAPE NEWENHAM
NUNIVAK ISLAND
ST. MATTHEW ISLAND
PRIBILOF ISLANDS
UNIMAK ISLAND
UNALASKA
AMUKTA I.
AMAKNAK I.
AKUTAN I.
UMNAK I.
BENNETT ISLAND
SEGUAM I.
SEGUAM PASS
CAPE SARICHEF
CAPE PROVIDENCE
CAPE KUPREANOF PT.
SHUMAGIN ISLANDS
ALEUTIAN TRENCH
KING COVE
SAND POINT
CHIGNIK
KODIAK
ALASKA PENINSULA
KUSKOKWIM BAY
NUNIVAK I.
HOOPER BAY
ST. MICHAEL
ANDREAFSKY R.
KUSKOKWIM R.
NUSHAGAK BAY
NUSHAGAK R.
TIKCHIK R.
NAKNEK R.
NAKNEK LAKE
KVICHAK R.
KVICHAK BAY
ILIAMNA LAKE
NAKNEK
KING SALMON
NAPASKIAK
NEWENHAM
DILLINGHAM
KANAKANAK
KANAKANAK R.
ALEKNAGIK
KOLIGANEK
KOLIGANEK R.
TOGIAK
TOGIAK BAY
TOGIAK R.
NEGUKTHLUK R.
NEGUKTHLUK
GOODNEWS BAY
GOODNEWS
QUINHAGAK
QUINHAGAK R.
ETOLIN POINT
ETOLIN STRAIT
HAGEMEISTER I.
SLOWPOKE
CAPE NEWENHAM
CAPE MENDENHALL
CAPE MAJOR
CAPE CORWIN
CAPE MISCHIEF
CAPE PIERCE
CAPE ROMANZOF
CAPE VANCOUVER
CAPE ST. MICHAEL
CAPE ST. MARKS
CAPE ST. ELIAS
CAPE ST. HYACINTH
CAPE ST. THADDEUS
CAPE ST. GREGORY
CAPE ST. MARY
CAPE ST. MATTHEW
CAPE ST. LAWRENCE
CAPE ST. JOHN
CAPE ST. JAMES
CAPE ST. JOSEPH

DX G-H 7+G-H-8

ALASKA - WEST COAST

BERING SEA

EASTERN PART

SOUNDINGS IN FATHOMS
AT MEAN LOWER LOW WATER

ABBREVIATIONS (For complete list of Symbols and Abbreviations, see C. & G. S. Chart No. 1)

Lights: F. fixed, Fl., flashing, Qk. flash., I. Qk. interrupted quick, Al., alternating, Occ. occulting, Alt. alternating, Mo. (A) morse, W. white, R. red, G. green, Vert. vertical, Hor. horizontal, Intens. intensified, Ra. radiating, Dia. diaphone, Hn. siren, Tr. trumpet, Bell, Gong, Whis. whistle, Siren, Horn, Trumpet,

B E R I N G S E A

A L E U T I A N I S L A N D S

P A C I F I C O C E A N

172° W

54° N

50° N

PROPOSED BASE LINE
FROM WHICH TO MEASURE THREE MILE LIMIT
FOR FISHERY REGULATIONS

OVERLAY FOR U.S.C.& G.S. CHART 9102
Amukta Island to Attu Island

ALASKA

ALEUTIAN ISLANDS

AMUKTA ISLAND TO ATTU ISLAND

SOUNDINGS IN FATHOMS

9102 PRICE $1.00

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U. S. COAST AND GEODETIC SURVEY
E. F. A. Davis, Director

LIGHTS, BEACONS, BUOYS, AND DANGERS CORRECTED
FOR INFORMATION RECEIVED TO THE FOLLOWING DATE

(Amukta Island to Attu Island) USC&GS 9102

PRICE $1.00

ALASKA

ARCTIC COAST

SOUNDINGS IN FATHOMS
AT MEAN LOWER LOW WATER

CAUTION

Temporarily defects in aids to navigation are not indicated on this chart, except when some reference is made to them in the Notice to Mariners.

CAUTION

The navigator does not assume any of the many dangerous conditions that may exist. Therefore, he must not rely entirely upon the information shown on this chart, but must use all available means and exercise every precaution for the safety of his vessel.

ARCTIC OCEAN

BEAUFORT SEA

CHUKCHI SEA

BERING STRAIT

WRANGELL I.

Point Barrow

Cape Lisburne

Cape Prince of Wales

SEWARD PENINSULA

SIBERIA

U.S.-RUSSIA CONVENTION OF 1867

ALASKA

BROOKS RANGE

BAIRD MTS.

DE LONG MTS.

ENDICOTT MTS.

ROMANZOF MTS.

DAVIDSON MTS.

FRANKLIN MTS.

MACKENZIE BAY

MACKENZIE R. DELTA

ALASKA CANADA

DOMINION OF CANADA

YUKON RIVER

68° N

162° W

148° W

PROPOSED BASE LINE
FROM WHICH TO MEASURE THREE MILE LIMIT
FOR FISHERY REGULATIONS

OVERLAY FOR U.S.C.&G.S. CHART 9400
Arctic Coast of Alaska

ABBREVIATIONS

HEIGHTS

AUTHENTICITY

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PRICE 75 CENTS

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U. S. COAST AND GEODETIC SURVEY
E. F. A. Hodds, Director

156°
155°
154°
153°
152°
151°
150°
149°
KNIK ARM
TURNAGAIN ARM
Fire I
(see chart 8553)
Chickaloon Bay
Trading Bay
(see chart 8553)
Redoubt Bay
Kalgin I
Shelikof Str
Tuxedni Bay
Alaskan Lease March 1967
COOK INLET
KACHEMAK
BLYING SOU
ILIAMNA LAKE
Iliamna Bay
Big I
CAUTION
Hydrography in Kamishak Bay from preliminary surveys, subject to revisions
Augustine I
Augustine Rks
KAMISHAK BAY
Rukaklek L
Douglas Is
Stevenson Entrance
Point Banks
Nunalik I (see chart 8537)
Nukuk Lake
Bay of Islands
Iliuk Arm
Kinakpalik I (see chart 8553)
Chinak
Ninagluk I
Nukshak
Black Cape
Tuxedni Pt
Tuxedni Bay
Tonnuzuk I
Tonnuzuk Rks
Kamishak Bay
Kaguyak Bay
Kaguyak Rks
Kaguyak Bay
Kukak Bay
Kukak Bay
Kuk